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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

CR No. 3:16-cr-00061-MO

Plaintiff,

**DEFENDANT'S MOTION TO
COMPEL NOTICE OF
SURVEILLANCE AND FOR
PRODUCTION OF RELATED
DISCOVERY**

v.

JOSEPH O'SHAUGHNESSY,

Defendant.

ORAL ARGUMENT REQUESTED

The defendant, Joseph O'Shaughnessy, through counsel, moves the government for notice of surveillance and for production of discovery related to surveillance in accordance with Federal Rule of Criminal Procedure 16, 18 U.S.C. § 3504, and the United States Constitution, amend. IV, V & VI. This motion relies on the argument and authorities set forth in the accompanying Memorandum In Support, filed herewith.

Statement Of Conferral

The defense has conferred with the government regarding the contents of this motion.

On May 11, 2016, I received a letter stating that the government opposes the motion.

Respectfully submitted on May 11, 2016.

/s/ Amy Baggio
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Attorney for Defendant O'Shaughnessy